

TCEQ Interoffice Memorandum

To: Luda Voskov, Project Manager; Superfund Section, Remediation Division

From: Larry Champagne, Ecological Risk Assessor; Technical Support Section, Remediation Division

Date: February 14, 2011

Subject: Gulfco Marine Maintenance Superfund Site
Draft Baseline Ecological Risk Assessment (BERA)
February 4, 2011

I have completed my review of this draft report and found it to be an accurate account of the ecological evaluations that have been conducted at this site, with the exception of the comment below. I continue to agree with the risk management recommendation made here and at our December 1, 2010 data review and planning meeting with EPA and Gulfco representatives that no ecologically-based preliminary remediation goals are necessary for this site.

Specific Comment:

1. P. 31-32, Section 4.2 Wetland Sediments, last paragraph: I suggest rewording these two sentences to read “The risk characterization results conclude that mortality and decreased growth of surviving organisms observed in the wetland sediment toxicity tests cannot be attributed to any one physical or chemical parameter. Considering the results as a whole, it is possible that a combination of parameters, such as TOC, certain sediment grain sizes, and certain COPEC concentrations may have influenced the pattern and degree of mortality of *Leptocheirus plumulosus* across all site and reference location wetland sediment samples.”

References:

Pastor, Behling & Wheeler, LLC. (PBW). 2010. Final Screening Level Ecological Risk Assessment Report, Gulfco Marine Maintenance Site, Freeport, Texas. May 3.

URS Corporation (URS). 2010. Final Preliminary Site Characterization Report, Gulfco Marine Maintenance Site, Freeport, Texas. November 30.